

**From:** [Daniel L. Polsby](#)  
**To:** [Caryn Shaw \(cshaw@shawattorneys.com\)](mailto:cshaw@shawattorneys.com)  
**Cc:** [Paige M. Neel](#)  
**Subject:** Howard Case Settlement  
**Date:** Monday, April 11, 2022 4:58:10 PM

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Caryn,

This email outlines the settlement agreement reached today. We will prepare a release and provide it to you ASAP.

1. Release of all claims against Respondent Board of Education and School District through the date of the release in exchange for \$92,500 inclusive of all fees and costs with each party to bear its own costs;
2. Dismissal with prejudice of all claims filed by Complainant, including Human Rights Commission claim and federal lawsuit;
3. Neutral job reference providing last job title and dates of employment;
4. Confidentiality agreement (Complainant not responsible for third party statements);
5. Nothing in the settlement agreement will restrict Complainant from testifying in court or administrative proceedings if she receives a subpoena;
6. 10 days for parties to cure or attempt to cure any breach of the settlement agreement; and
7. The parties have agreed to waiver of reapplication – Complainant shall never apply for any positions with Respondent, but will be phrased in neutral manner.

**Daniel L. Polsby | Partner**

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**EXHIBIT 3**